

Decision \_\_\_\_\_

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Application of Southern California Edison Company (U338E) for Approval of its 2012-2014 California Alternate Rates for Energy (CARE) and Energy Savings Assistance Programs and Budgets.

Application 11-05-017  
(Filed May 16, 2011)

And Related Matters.

Application 11-05-018  
Application 11-05-019  
Application 11-05-020

**DECISION GRANTING COMPENSATION TO  
THE UTILITY REFORM NETWORK FOR SUBSTANTIAL CONTRIBUTION  
TO DECISIONS (D.) 12-12-011 AND D.14-08-030**

<b>Intervenor: The Utility Reform Network (TURN)</b>	<b>For contribution to Decision (D.) 12-12-011 and D.14-08-030</b>
<b>Claimed: \$84,108.50</b>	<b>Awarded: \$77,217.01</b> (reduced 8.1%)
<b>Assigned Commissioner: Catherine J.K. Sandoval</b>	<b>Assigned Administrative Law Judge (ALJ): Kimberly Kim</b>

**PART I: PROCEDURAL ISSUES**

<b>A. Brief description of Decision:</b>	In D.12-12-011, <i>Decision on Continued Funding of the Community Help and Awareness with Natural Gas and Electricity Services [CHANGES] Pilot Program from California Alternate Rate for Energy Program 2012-2014 Cycle Budgets</i> , the California Public Utilities Commission (Commission) approved continued funding for the CHANGES program through 2014; provided clarity on the roles and responsibilities of the utilities, the CHANGES Contractor, the CHANGES community based organizations, and the Commission's Consumer Service and Information Division (CSID); and provided for the collection of additional data to enable the Commission to subsequently determine whether the CHANGES Pilot Program should
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	<p>become a permanent program, and if so, how to fund and administer it.</p> <p>In D.14-08-030, <i>Phase II Decision on the Large Investor-Owned Utilities' 2012-2014 Energy Savings Assistance (ESA) and California Alternate Rates for Energy (CARE) Program Applications</i>, the Commission resolved several pending Petitions for Modification of D.12-08-044, revisited the inclusion in the ESA program of several measures, and addressed water-energy nexus measures, addressed the audit of SoCalGas, addressed the various studies and working group reports produced during Phase II, as well as Phase II program monitoring issues, and provided guidance to the utilities for their next cycle 2015-2017 program applications, due in November 2014.</p>
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:**

	<b>Intervenor</b>	<b>CPUC Verified</b>
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference (PHC):	August 8, 2011	Verified.
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	September 7, 2011	Verified.
4. Was the NOI timely filed?		Yes, TURN timely filed the notice of intent to claim intervenor compensation.
<b>Showing of customer or customer-related status (§ 1802(b)):</b>		
5. Based on ALJ ruling issued in proceeding number:	P.10-08-016	Verified.
6. Date of ALJ ruling:	Nov. 22, 2010	Verified.
7. Based on another Commission determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		Yes, TURN demonstrated appropriate customer-related status.
<b>Showing of "significant financial hardship" (§ 1802(g)):</b>		

9. Based on ALJ ruling issued in proceeding number:	P.10-08-016	Verified.
10. Date of ALJ ruling:	Nov. 22, 2010	Verified.
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes, TURN demonstrated significant financial hardship.
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.14-08-030	Verified.
14. Date of issuance of Final Order or Decision:	Aug. 20, 2014	Verified.
15. File date of compensation request:	Oct. 20, 2014	Verified.
16. Was the request for compensation timely?		Yes, TURN timely filed the request for compensation.

**PART II: SUBSTANTIAL CONTRIBUTION**

**A. Did the Intervenor substantially contribute to the final decision (*see* § 1802(i), § 1803(a), and D.98-04-059).**

<b>Intervenor's Claimed Contribution(s)</b>	<b>Specific References to Intervenor's Claimed Contribution(s)</b>	<b>CPUC Discussion</b>
<p>1. <u>CARE Categorical Eligibility &amp; Enrollment: Implementation of D.12-08-044</u></p> <p>TURN, working with ally organizations, successfully addressed two issues related to the implementation of D.12-08-044's directives regarding CARE eligibility and enrollment, specifically related to "Categorical Eligibility."</p>	<ul style="list-style-type: none"> <li>• TURN et al. Protest of PG&amp;E Advice Letter (AL) 3340-G/4136-E (<i>See</i> Attachment 5).</li> <li>• PG&amp;E Letter Withdrawing AL 3340-G/4136-E (<i>See</i> Attachment 5).</li> <li>• D.14-08-030, at 69-70 (discussing the Joint AL SoCalGas 4457-G, SDG&amp;E</li> </ul>	<p>Verified; but we note TURN put forth arguments that were duplicative of other parties on this issue. This demonstrates that these parties failed to adequately coordinate on the Categorical Eligibility issue</p>

<p>First, PG&amp;E submitted an Advice Letter (AL) on Nov. 9, 2012, proposing to remove Categorical Eligibility from its CARE Re-certification forms. TURN et al. protested PG&amp;E's AL on the grounds that it was inconsistent with D.12-08-044. On Feb. 28, 2013, PG&amp;E withdrew its AL. As such, the Commission never needed to reach the merits of the dispute, saving time and resources for all involved.</p> <p>Then TURN joined other consumer groups in protesting the Joint AL submitted by the IOUs in early 2013 pursuant to OP 88 in D.12-08-044, which directed the IOUs to submit annual ALs proposing changes, if any, to the list of programs conferring "Categorical Eligibility" for CARE. Following our protest, TURN and our allies sent a letter to Commissioner Sandoval arguing that the relief sought in the IOUs' Joint AL was inappropriate for Staff disposition as a matter of law. We urged Staff to reject the Joint AL without prejudice so that the policy and legal issues presented therein could be properly brought before the Commission by further comment and/or briefing in A.11-05-017 et al. Shortly thereafter, Staff rejected the Joint AL without prejudice, explaining that it raised "significant</p>	<p>2455-E/2170-G, SCE 2849-E, and PG&amp;E 3361-G/4186-E, and the Commission's response thereto).</p> <ul style="list-style-type: none"> <li>• Energy Division Disposition Letter re: AL SoCalGas 4457-G, SDG&amp;E 2455-E/2170-G, SCE 2849-E, and PG&amp;E 3361-G/4186-E (discussing protests and incorporating the legal analysis presented in the TURN et al. Letter) (<i>See Attachment 5</i>).</li> <li>• TURN et al. Letter to Commissioner Sandoval (<i>See Attachment 5</i>).</li> </ul>	<p>which resulted in duplicative efforts.<sup>1</sup></p>
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<sup>1</sup> 2015 Cal. PUC LEXIS 264 (Cal. PUC 2015).

<p>unforeseen policy issues requiring review in a formal proceeding,” and was in other regards “violative of D.12-08-044.” Then on July 24 2013, Commissioner Sandoval issued the <i>Joint Second Amended Scoping Memo of the Assigned Commissioner and ALJ</i>, explicitly incorporating these issues into the scope of Phase II and indicating that she would solicit further comment in short order.</p>		
<p>2. <u>CARE Eligibility &amp; Enrollment: Phase II ACR</u></p> <p>On February 25, 2014, Commissioner Sandoval issued the <i>Assigned Commissioner’s Ruling Concerning Categorical Eligibility and Enrollment and Definition of Income</i> (CE-ACR). TURN, working in close coordination with other consumer groups, submitted comments and reply comments in response to the CE-ACR. In D.14-08-030, the Commission determined that the issues raised in the CE-ACR – with one exception - were not ripe for resolution and required additional record development in the successor proceeding to A.11-05-017 et al. The exception is the issue of whether housing subsidies should be counted as income in determining income-eligibility for CARE and ESAP. The Commission in D.14-08-030 adopted TURN’s recommendation, shared by other parties, that housing subsidies not be counted as income. (TURN et al. Comments on the CE-ACR,</p>	<ul style="list-style-type: none"> <li>• D.14-08-030, at 71 (referring the review of all but one of the issues raised in the CE-ACR to the next program cycle docket, and determining that housing subsidies should not be considered income).</li> <li>• Comments of TURN, ORA, CforAT, and Greenlining in Response to Commissioner Sandoval’s Ruling Concerning Categorical Eligibility and Enrollment and Definition of Income, filed March 11, 2014.</li> <li>• Reply Comments of TURN and CforAT in Response to Commissioner Sandoval’s Ruling Concerning Categorical Eligibility and Enrollment and Definition of Income, filed March 17, 2014.</li> <li>• TURN Comments on the Phase II Alternate Proposed Decision, filed July 17, 2014, at 4.</li> </ul>	<p>Verified; but TURN put forth duplicative arguments on this issue.</p>

<p>at 24-25).</p> <p>In comments on the Phase II Alternate Proposed Decision TURN recommended that the Commission clarify that parties eligible for intervenor compensation could seek compensation for work responding to the CE-ACR in the proceeding in which the Commission resolves these issues on the merits. However, the Commission was silent on that issue. Accordingly, TURN includes our time and expenses associated with responding to the CE-ACR in this request for compensation, as that work was conducted in this proceeding pursuant to the Commission's invitation in the CE-ACR.</p> <p>Should the Commission determine that this time and associated direct expenses (copying, postage) should be excluded from this request for compensation and instead submitted in the docket in which the Commission ultimately reaches the merits of these issues, TURN respectfully requests that the Commission remove the time coded "<b>Ph2-ACR-CE</b>" (50.75 hours) and the costs associated with filing TURN's opening and reply comments on March 11 and 17, 2014, and authorize TURN to re-submit the same at a later time. TURN has separately identified the 1.75 hours associated with addressing the one issue in the CE-ACR that was resolved in D.14-08-030 with the code</p>		
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<p>“<b>Ph2-ACR-CE*</b>” and requests that this time be included in the instant claim.</p>		
<p>3. <u>CARE Eligibility &amp; Enrollment: Post-Enrollment Verification</u></p> <p>TURN demonstrated that the discussion of CARE probability modeling and post-enrollment verification (PEV) in the Phase II Proposed Decision and Alternate Proposed Decision should be modified to more accurately reflect what is known about the results of the new probability models by indicating the need for more information about customers who are non-responsive to the IOUs’ PEV requests.</p>	<ul style="list-style-type: none"> <li>• D.14-08-030, at 80 (adding Section 6.3.2.5 “Non-responsive Customers” to the discussion of Probability Modeling and Post Enrollment Verifications in the Phase II Proposed Decision and Phase II Alternate Proposed Decision).</li> <li>• Phase II Alternate Proposed Decision, Revision 1 (showing the addition of Section 6.3.2.5 in “redline”) and Phase II Proposed Decision, Revision 1 (showing the addition of Section 6.3.2.5 in “redline”).</li> <li>• TURN Comments on the Phase II Proposed Decision, filed June 2, 2014 at 13-14.</li> <li>• TURN Comments on the Phase II Alternate Proposed Decision, filed July 17, 2014, at 4-6.</li> </ul>	<p>Verified; but TURN put forth duplicative arguments on this issue.</p>
<p>4. <u>Phase II Working Groups: Mid-Cycle Working Group</u></p> <p>TURN was an active participant in the Mid-Cycle Working Group (MCWG), created pursuant to D.12-08-044. TURN’s long-time outside consultant Cynthia Mitchell represented TURN as a formal member of the Working Group. Aside from Ms. Mitchell’s participation on the MCWG’s principal tasks of</p>	<ul style="list-style-type: none"> <li>• D.14-08-030 at 67-69 (approving the MCWG’s proposed revisions to the Policy and Procedure Manual, with limited exceptions; directing that the revised Installation Standards Manual be rolled out immediately; and finding reasonable and adopting the MCWG’s additional recommendation that “there should be continued</li> </ul>	<p>Verified.</p>

<p>updating the ESA Program Statewide Policy and Procedure and Installation Standards Manuals, Ms. Mitchell was also a driving force behind the WG's ultimate willingness to consider additional program improvement issues, consistent with TURN's understanding of the Commission's intent in D.12-08-044.</p> <p>Section 3 of the MCWG's Final Report reflects the fruit of Ms. Mitchell's efforts to broaden the scope of the Group's purview (with support from then-DRA and California Housing Partnership Corporation). TURN in particular was an advocate of the Group's consideration of using free, available software to benchmark energy usage data at multifamily properties. Ultimately, the MCWG reached consensus that the "feasibility of automatic uploading of utility usage data for residential multifamily properties will be investigated."</p> <p>The Commission determined that the Final Recommendations of the MCWG were generally reasonable and adopted nearly all of them in D.14-08-030.</p>	<p>efforts ... to streamline the IOUs' reporting requirements and to continue to examine and share best practices and process improvements by exploring, sharing and recommending alternatives to the existing practices, including income verification process, contractor licensing requirements, and investigation of the feasibility of uploading utility usage data for residential master-metered buildings/multifamily properties").</p> <ul style="list-style-type: none"> <li>• Mid-Cycle Working Group Final Report, dated July 15, 2013 (incorporated into the record of A.11-05-017 et al. by ALJ Ruling on Aug. 1, 2014). <i>See, e.g.</i>, Section III, at 6-9, addressing TURN et al.'s recommendation to support multifamily properties with energy usage data uploads to benchmarking software; Appendix A, listing Cynthia Mitchell as a member on behalf of TURN.</li> <li>• TURN Comments on the Final Reports of the Working Groups and ALJ Kim's Related Questions, filed Oct. 17, 2013 (advocating adoption of all of the MCWG's recommendations).</li> </ul>	
<p><u>5. Phase II Working Groups: Cost-Effectiveness Working Group</u></p> <p>TURN was an active participant</p>	<ul style="list-style-type: none"> <li>• D.14-08-030 at 65-66 (adopting the four consensus recommendations of the CEWG and directing Energy</li> </ul>	<p>Verified.</p>



<p>in the Cost-Effectiveness Working Group (CEWG), created pursuant to D.12-08-044. TURN's long-time outside consultant Cynthia Mitchell represented TURN as a formal member of the Working Group. TURN conducted analysis and helped to develop proposals to change the existing cost-effectiveness framework applied to the ESA program and worked with the other WG members to arrive at a set of consensus recommendations to present to the Commission, as well as a short list of outstanding issues warranting further investigation. Given the wide array of interests reflected in the CEWG's membership, TURN submits that all CEWG members should be commended for this remarkable accomplishment.</p> <p>Then when the Phase II Proposed Decision would have declined to adopt any of the CEWG's recommendations without any discussion or analysis whatsoever, and instead continue them to the successor proceeding, TURN demonstrated in Opening Comments that the Phase II Proposed Decision erred as a matter of law and was simply bad policy (at 2-12). The Commission changed course and adopted all four of the CEWG's consensus recommendations in D.14-08-030.</p> <p>The Commission also adopted the general approach advocated by TURN for dealing with an issue left unresolved by the CEWG.</p>	<p>Division to convene a WG to develop a program-level cost-effectiveness threshold as quickly as possible, provided that if consensus could not be reached in time for use in the IOUs' 2015-2017 applications, the IOUs should "make every effort to achieve a higher level of cost efficiency as possible").</p> <ul style="list-style-type: none"> <li>• Cost-Effectiveness Working Group Final Report, dated July 15, 2013 (incorporated into the record of A.11-05-017 et al. by ALJ Ruling on Aug. 1, 2014).</li> <li>• TURN Comments on the Final Reports of the Working Groups and ALJ Kim's Related Questions, filed Oct. 17, 2013 (advocating adoption of all of the CEWG's recommendations and addressing the cost-effectiveness threshold issue).</li> <li>• TURN Comments on the Phase II Proposed Decision, filed Jun. 2, 2014 at 2-12 (arguing that the PD erred in continuing all of the CEWG's recommendations to the successor proceeding).</li> <li>• TURN Reply Comments on the Phase II Proposed Decision, filed Jun. 9, 2014 at 2-3 (addressing the cost-effectiveness threshold issue).</li> </ul>	
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<p>The CEWG could not reach consensus on a program-level cost-effectiveness threshold for the ESA Program. TURN argued in Reply Comments on the Phase II Proposed Decision that the Commission should direct the CEWG to reconvene and try to reach consensus on the outstanding issue of a portfolio cost-effectiveness threshold for the IOUs to use in their 2015-2017 applications, but if not successful in time, the IOUs should not delay filing (at 2-3). TURN had earlier argued in Comments on the Final Working Group Reports that the Commission should direct the IOUs to “strive for the highest level of cost efficiency, while reaching participation targets and maximizing energy savings per household” in their 2015-2017 applications (TURN 10/17/13 Comments, at 3). The Commission in D.14-08-030 adopted an amalgam of these approaches. The Commission directed Energy Division to convene a WG to develop a program-level cost-effectiveness threshold as quickly as possible, provided that if consensus could not be reached in time for use in the IOUs’ 2015-2017 applications, the IOUs should “make every effort to achieve a higher level of cost efficiency as possible [sic].”</p>		
<p><u>6. CHANGES Program</u></p> <p>TURN’s contributions to the Commission’s treatment of the</p>	<p><u>Contributions to D.12-12-011</u></p> <ul style="list-style-type: none"> <li>• D.12-12-011 at 23-24 (rejecting SCE,</li> </ul>	<p>Verified.</p>

<p>CHANGES program are reflected in D.12-12-011 and D.14-08-030.</p> <p><u>D.12-12-011</u></p> <p>TURN demonstrated that the Proposed Decision preceding D.12-12-011 (CHANGES PD) should be modified to clarify the role of the CHANGES Contractor vis-à-vis the utilities and the community-based organizations (CBOs) under sub-contract to the CHANGES Contractor. TURN recommended that the PD be modified to reflect the role of the CHANGES Contractor as the go-between for the utilities and CBOs, who should be present when and if the utilities are meeting directly with the CBOs to address program administrative issues (TURN Comments on CHANGES PD at 5-6). The CHANGES PD was subsequently modified to clarify the role of the CHANGES Contractor, consistent with the spirit of TURN's recommendations.</p> <p>Second, TURN successfully opposed the efforts of SCE and SDG&amp;E/SoCalGas to directly administer the CHANGES Pilot Program in their service territories (TURN et al. Reply Comments on CHANGES PD, pp. 1-3). The Commission agreed in D.12-12-011 that the program should continue to be administered by the Commission's CSID until further evaluation of the Pilot's future.</p> <p><u>D.14-08-030</u></p> <p>TURN also addressed the</p>	<p>SDG&amp;E/SoCalGas's requests to directly administer the CHANGES program) at 29 (indicating that changes had been made to the PD pursuant to comments to clarify the role of the CHANGES Contractor).</p> <ul style="list-style-type: none"> <li>• CHANGES Proposed Decision, Revision 1 (showing changes in "redline" throughout the decision to insert "CHANGES Contractor" into places where meetings or contact between the utilities and CBOs are mentioned).</li> <li>• TURN Comments on the CHANGES PD at 5-6 (addressing the role of the CHANGES Contractor).</li> <li>• TURN et al. Reply Comments on the CHANGES PD at 1-3 (opposing utility administration of the CHANGES pilot).</li> </ul> <p><u>Contributions to D.14-08-030</u></p> <ul style="list-style-type: none"> <li>• D.14-08-030 at 81, Section 6.3.3 "Community Help and Awareness of Natural Gas and Electricity Services Pilot Program" at 91 (explaining that Section 6.3.3 was added in response to comments on the proposed decision).</li> <li>• TURN Comments on the Phase II Alternate Proposed Decision, filed July 17, 2014, at 6-7.</li> <li>• TURN Reply Comments on the Phase II Alternate Proposed Decision, filed July 22, 2014</li> </ul>	
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<p>treatment of the CHANGES program by the Phase II Alternate Proposed Decision. (The Phase II Proposed Decision was silent on CHANGES.) TURN demonstrated that the Commission should clearly indicate that it will undertake the full evaluation of CHANGES contemplated in D.12-12-011 to determine whether to continue CHANGES as a full, ongoing program – as opposed to a pilot – and if so, how the program should be funded and at what level. TURN recommended that this evaluation occur as soon as practicable in the successor CARE/ESA program proceeding. The Commission adopted both of these recommendations in D.14-08-030, which clarifies that the full review of CHANGES will occur as part of the 2015-2017 program cycle applications and thus provides 2015 bridge funding for changes pending this comprehensive review.</p> <p>Finally, TURN demonstrated that the Commission should reject PG&amp;E’s request that the Commission halt funding for the CHANGES program after 2014 because PG&amp;E would instead absorb the CHANGES function into its in-house Customer Care organization funded through the General Rate Case (GRC).</p>	<p>at 2-4 (addressing 2015 bridge funding for CHANGES, the necessary evaluation, and PG&amp;E’s proposal to unilaterally move the program activities in-house).</p>	
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**B. Duplication of Effort (§ 1801.3(f) and § 1802.5):**

	<b>Intervenor's Assertion</b>	<b>CPUC Discussion</b>
<b>a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?</b> <sup>2</sup>	Yes.	Verified.
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	Yes.	Verified.
<b>c. If so, provide name of other parties:</b> TURN's positions overlapped to various degrees with the following parties: Office of Ratepayer Advocates (ORA), Center for Accessible Technology (CforAT), Greenlining Institute (Greenlining), National Consumer Law Center (NCLC), California Housing Partnership Corporation (CHPC), National Housing Law Project (NHLP), and the Natural Resources Defense Council (NRDC).		Verified.
<b>d. Intervenor's claim of non-duplication:</b> TURN's efforts to coordinate with other parties with similar interests were extensive and effective at ensuring that TURN was able to minimize or avoid undue duplication in our participation in this proceeding.  TURN took the lead on several of the projects addressing CARE Eligibility and Enrollment issues, reducing the time that other consumer groups needed to devote to research, analysis and writing. For instance, TURN lead the effort to protest PG&E AL 3340-G/4136-E in late 2012. Then Greenlining played the leading role in drafting the protest to the IOUs' Joint AL proposing to change the list of categorical eligibility programs (with support from TURN), and TURN drafted the consumer groups' March 2013 letter to Commissioner Sandoval presenting the legal analysis showing that Staff disposition was inappropriate.  A year later, when Commissioner Sandoval issued her Feb. 25, 2014, ACR on Categorical Eligibility issues, TURN worked closely with ORA, Greenlining, CforAT, NCLC, NRDC, and CHPC to coordinate coverage of issues and strategy. TURN submitted opening comments jointly with ORA, Greenlining, and CforAT, which were prepared collectively, pursuant to the		Verified, but <i>see</i> CPUC Disallowances and Adjustments, below.

<sup>2</sup> The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

workplan the organizations devised, and which referenced the comments filed by NCLC/NRDC/CHPC/NHLP. TURN was a very active part of this project team. TURN also closely coordinated the preparation of reply comments with ORA, CforAT, and Greenlining, and NCLC et al., dividing up issues for coverage by the various groups in separately filed comments. TURN took the lead on drafting reply comments filed jointly with CforAT.

On the other hand, thanks to TURN's coordination with CforAT and Greenlining, TURN was able to devote minimal time to reviewing and addressing the Phase II studies, including the LINA and Energy Education studies, while those other parties took the lead on advocacy.

TURN worked closely with ORA (then DRA) throughout the CEWG and MCWG process to ensure that our efforts were complementary. Working in concert, both groups were able to achieve efficiencies and enhanced productivity and results.

TURN also coordinated with the other consumer groups regarding the CHANGES Proposed Decision. TURN drafted reply comments on behalf of then-DRA, Greenlining, and CforAT, thus minimizing the time required of those other parties.

Once the Phase II Proposed Decision and Alternate Proposed Decision issued, TURN conferred with other parties with similar or overlapping interests to ensure that all issues could be addressed with minimal or no overlap. TURN exchanged drafts of comments with ally organizations (including ORA, Greenlining, CforAT, NCLC, NRDC, CHPC, and NHLP) in advance of filing to allow each of us to simply reference support for the recommendations of others or to complement their showings. This coordination greatly reduced the resources TURN needed to expend on several important issues addressed in D.14-08-030, such as the 2013 LINA (where CforAT took the lead) and the 2013 Multifamily Segment Study (where NCLC/NRDC/CHPC/NHLP took the lead). TURN's close coordination with these other parties is reflected in TURN's timesheets and in TURN's comments and reply comments.

In a proceeding such as this where many stakeholder groups are encouraged to participate, some degree of duplication may be practically unavoidable.<sup>3</sup>

<sup>3</sup> See, i.e. D.96-08-040 (67 CPUC 2d 562, 575-576.X)("[B]ecause of the extraordinary level of participation required of both parties and intervenors throughout these proceedings, we find that a reduction in the amount awarded to intervenors based on duplication of effort is unwarranted. Section 1803(b) requires that the awarding of fees to intervenors "be administered in a manner that encourages the effective and efficient participation of all groups that have a stake in the public utility regulation process." Each of the intervenor groups clearly has a stake in the process of restructuring California's electrical services industry and we are grateful for their participation in these proceedings. Moreover, we rely on them to continue their effective and efficient participation in our

*Footnote continued on next page*

<p>TURN and other parties at times supported overlapping recommendations, but TURN's compensation in this proceeding should not be reduced for duplication of the showings of other parties. Moreover, in those instances, TURN sought to bolster support for the proposal by emphasizing distinct facts or authority to support the recommendation, to the extent practicable. Accordingly, TURN respectfully submits that the Commission should find that there was no undue duplication, as any duplication served to materially supplement, complement or contribute to the showing of another party and, therefore, is fully compensable under PU Code Section 1802.5. Hence, the Commission should not reduce TURN's award of compensation due to duplication.</p>	
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### **PART III: REASONABLENESS OF REQUESTED COMPENSATION**

#### **A. General Claim of Reasonableness (§ 1801 and § 1806):**

<b>a. Intervenor's claim of cost reasonableness:</b>	<b>CPUC Discussion</b>
<p>TURN's request for intervenor compensation seeks an award of approximately <b>\$84,000</b> as the reasonable cost of our participation in this proceeding over the past two years. TURN submits that these costs are reasonable in light of the importance of the issues TURN addressed and the benefits to customers.</p> <p>TURN's advocacy reflected in D.12-12-011 and D.14-08-030 addressed policy matters related to the CARE and ESA programs, rather than specific rates or disputes over particular dollar amounts. The CARE program is intended to increase the affordability of natural gas and electricity services for low-income utility customers. The ESA program likewise is intended to advance the affordability of utility services by helping customers reduce consumption, thereby also providing ratepayers with an energy resource. ESAP also seeks to improve the health, comfort and safety of low-income households. Thus, TURN cannot easily identify precise monetary benefits to ratepayers from our work in this proceeding, given the nature of the issues presented. For this reason, the Commission should treat this</p>	<p><b>Verified.</b></p>

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proceedings as we move forward with the many implementation tasks ahead. [footnote omitted][¶] . . . In a broad, multi-issue proceeding such as this, we expect to see some duplication of contribution. This duplication does not diminish the value of that contribution to the Commission. In our view, to deduct from an award of reasonable fees in this case would not encourage the effective and efficient participation of all stakeholders in the spirit of § 1801.3(b).")

compensation request as it has treated similar past requests with regard to the difficulty of establishing specific monetary benefits associated with TURN's participation. (*See i.e.* D.07-12-040 at 21 (awarding TURN intervenor compensation for energy efficiency policy work in A.05-06-004 et al.).)<sup>4</sup>

Despite the lack of easily quantifiable customer benefits, TURN submits that its positive impact on the CARE and ESA programs will afford low-income residential customers expanded opportunities to avoid service termination and to continue receiving gas and electricity services. Because utility shutoffs trigger all kinds of financial impacts, including service reinstatement costs, food spoilage and replacement costs, and possibly eviction, in addition to a host of health and safety issues, policies that assist consumers in being able to pay their bills and avoid shutoffs bestow enormous benefits upon those Californians most in need of assistance.

TURN furthermore submits that our contributions to the ESA program in this proceeding will afford the ratepayers of PG&E, SCE, SDG&E and SoCalGas with significant benefits, as the establishment of energy efficiency policies has a direct and lasting impact on customer rates. The ESA program, as an energy efficiency (EE) program, will yield demand side resources designed to displace supply side resource procurement. As the energy crisis demonstrates, procurement costs can be a major driver of utility outlays and retail rates. The astronomical rate increases of 2001 can be linked to the extraordinary costs of wholesale electricity. In the future, procurement expenditures may continue to represent the least predictable component of utility costs. Therefore, appropriate energy efficiency (and integrated resource planning) policies and prudent planning practices will be essential to maintaining both low and stable rates. TURN's contributions to this proceeding will assist the Commission in achieving its energy efficiency goals, as well as the mandates of AB 32. Moreover, TURN's contributions will promote long-term rate stability, reduce risks to

<sup>4</sup> *See also* D.99-12-005 at 6-7 (Compensation Decision in 1995 Storm Phase of PG&E GRC, A.97-12-020) and D.00-04-006 at 9-10 (Compensation Decision in Edison PBR Midterm Review, A.99-03-020) (recognizing the overall benefit of TURN's participation where that participation assisted the Commission in developing a record on which to assess the reasonableness of the utility's operations, and particularly its preparedness and performance in the future); D.00-05-022 (Compensation Decision in the Emergency Standards Proceeding) (awarding TURN \$92,000 in D.00-10-014 for our substantial contribution to the earlier decision, despite TURN's inability to assign a dollar value to the benefit of our participation in order to demonstrate "productivity." Interestingly, the Commission awarded compensation even though the emergency restoration standards may never come into play in the future, since they come into play only after a "major outage," which is defined as impacting more than 10% of a utility's customers. The contingent nature of the future standards did not cause the Commission to hesitate in awarding TURN compensation.).



<p>ratepayers and contribute to resource diversity that should help to mitigate the impact of future market dysfunction.</p> <p>For all of these reasons, the Commission should find that TURN's efforts have been productive.</p>	
<p><b>b. Reasonableness of hours and direct expenses claimed:</b></p> <p>This Request for Compensation includes 285 hours of TURN's attorney and consultant time covering periodic work over the past two years (since the issuance of D.12-08-044). TURN's efforts reflected herein resulted in numerous contributions to D.12-12-011 and D.14-08-030, detailed above, and encompass active participation on the Cost-Effectiveness Working Group and Mid-Cycle Working Group, and the preparation of a dozen formal filings by TURN, plus other activities related to active participation in this proceeding. Such efforts included but were not limited to attending workshops and advocacy after the issuance of the PD, including participation in several ex parte meetings. For all of these reasons, as well as those provided below, TURN submits that the number of hours for each TURN representative is reasonable.</p> <p><u>TURN Staff Hours</u></p> <p>TURN assigned one staff attorney to cover Phase II of this proceeding, Hayley Goodson. Ms. Goodson was also one of TURN's two representatives in Phase I, so she brought subject matter and procedural familiarity to the Phase II proceedings. Ms. Goodson worked to achieve efficiencies throughout this proceeding by coordinating closely with other parties with similar interests to TURN's. On some projects, Ms. Goodson took the lead on behalf of a group of like-minded parties, while on other projects Ms. Goodson relied on the efforts of others. Thus, Ms. Goodson's coordination with other parties resulted in reduced hours for other parties where TURN took the lead, as well as reduced hours for TURN when TURN played more of a supportive role.</p> <p>It is important to recognize that close coordination requires each party to devote some amount of time to the coordination itself, as well as reviewing and editing drafts prepared by allies to ensure that each party can support the contentions expressed therein. Ms. Goodson's timesheets reflect these tasks. TURN submits that this due diligence work is an integral part of coordination, and should be viewed as a modest investment in the ultimate efficiencies that ensue, to the benefit of the Commission's record-development process, as well as the ratepayers who will ultimately pay for awards of intervenor compensation.</p>	<p>Verified, but <i>see</i> CPUC Disallowances and Adjustments, below.</p>

TURN Consultant Hours

TURN also relied on outside expert consultants Cynthia Mitchell and her associate Gillian Court, of Energy Economics, Inc. Ms. Mitchell served as TURN's representative on the Cost-Effectiveness Working Group and Mid-Cycle Working Group, and Ms. Court assisted Ms. Mitchell with related research and analysis.

Travel Time and Expenses

TURN requests compensation for the time and expenses associated with Ms. Mitchell's travel from Reno, NV to San Francisco for the in-person Cost-Effectiveness Working Group meeting held on Jan. 10, 2013. Ms. Mitchell lives and works in Reno and attended all other Working Group meetings by telephone to reduce costs. Because Ms. Mitchell was able to combine this trip with travel for other work at the Commission, TURN has allocated only 50% of the time and expense to this proceeding. Attachments 2 and 3 include this detail.

Summary

TURN submits that the Commission should find the hours requested here to be reasonable under the circumstances, and that TURN's showing supports that conclusion. However, should the Commission believe that more information is needed or that a different approach to discussing the reasonableness of the requested hours is warranted here, TURN requests the opportunity to supplement this section of the request.

**c. Allocation of hours by issue:**

TURN has allocated its daily time entries by activity codes to better reflect the nature of the work reflected in each entry. TURN has used the following activity codes:

Code	Description	Allocation of Time
Ph2-GP	The work in this category includes activities associated with general participation in this proceeding, such as reading ALJ/AC rulings, tracking the Phase II studies and coordinating coverage of such with other parties, and addressing scheduling and procedural issues with other parties.	5.4%
CHANGES	Work related to the CHANGES Pilot	3.9%

Verified.

	Program.		
PEV	Work related to CARE Post-Enrollment Verification (PEV).	0.6%	
Ph2-CE	Work related to CARE Categorical Eligibility.	15.8%	
Ph2-ACR-CE	Work responding to the Feb. 25, 2014 ACR concerning Categorical Eligibility and Enrollment and Definition of Income -- other than addressing the treatment of housing subsidies as income.	17.8%	
Ph2-ACR-CE*	Work responding to the Feb. 25, 2014 ACR concerning Categorical Eligibility and Enrollment and Definition of Income on the issue of the treatment of housing subsidies as income.	0.6%	
Ph2-CEWG	Work related to the Phase II Cost-Effectiveness Working Group.	15.6%	
Ph2-MCWG	Work related to the Phase II Mid-Cycle Working Group.	11.2%	
Ph2-WGs	Work related to the Phase II Working Groups, where such work pertained to both the CEWG and MCWG.	4.0%	
Ph2-PD	Work related to the Phase II Proposed Decision, where such work was not readily allocated to a specific issue code.	11.2%	
Ph2-APD	Work related to the Phase II Alternate Proposed Decision, where such work was not readily allocated to a specific issue code.	7.4%	
Ph2-Travel	Travel time associated with the Phase II CEWG.	1.3%	
Ph2-comp	Intervenor Compensation: work preparing the instant Request for Compensation.	5.3%	
<b>TOTAL</b>		<b>100.0%</b>	
<p>If the Commission believes that a different approach to issue-specific allocation is warranted here, TURN requests the opportunity to supplement this section of the request.</p>			

**B. Specific Claim:\***

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Hayley Goodson, TURN Attorney	2012	23.25	\$325	D.13-08-022	\$7,556.25	20.80 [1][2]	\$325.00	\$6,760.00
Hayley Goodson, TURN Attorney	2013	51.50	\$345	Res. ALJ-287 + 5% Step Increase	\$17,767.50	43.86	\$345 <sup>5</sup>	\$15,131.70
Hayley Goodson, TURN Attorney	2014	123.25	\$345	Hourly Rate Requested for 2013 (to be adjusted by 2014 COLA if any)	\$42,521.25	109.44	\$355 <sup>6</sup>	\$38,851.20
Cynthia Mitchell, Energy Economics	2012	26.50	\$180	D.11-06-012, D.14-02-037	\$4,770.00	26.50	\$185.00 <i>See</i> D.15-01-017.	\$4,902.50
Cynthia Mitchell, Energy Economics	2013	37.50	\$200	Requested in TURN Claim filed in R.12-01-005 on Nov. 12, 2013	\$7,500.00	37.50	\$200.00 <i>See</i> D.15-01-016.	\$7,500.00
Cynthia Mitchell, Energy Economics	2014	1.00	\$200	Same Rate as Requested for 2014	\$200.00	1.00	\$205.00 <i>See</i> Res. ALJ-303.	\$205.00
Gillian Court, Energy	2012	3.5	\$150	D.11-06-012, D.14-02-037	\$525.00	3.50	\$150.00	\$525.00

<sup>5</sup> Adopted in Decision (D.) 15-05-019.

<sup>6</sup> Application of 2.58% COLA per Resolution ALJ-303.

Economics								
<b>Subtotal: \$80,840.00</b>						<b>Subtotal: \$73,875.40</b>		
<b>OTHER FEES</b>								
<b>Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):</b>								
<b>Item</b>	<b>Year</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Basis for Rate*</b>	<b>Total \$</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Total \$</b>
Travel -- Cynthia Mitchell	2013	3.75	\$100	1/2 of requested hourly rate for 2013	\$375.00	3.75	\$100.00	\$375.00
<b>Subtotal: \$375.00</b>						<b>Subtotal: \$375.00</b>		
<b>INTERVENOR COMPENSATION CLAIM PREPARATION **</b>								
<b>Item</b>	<b>Year</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Basis for Rate*</b>	<b>Total \$</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Total \$</b>
Hayley Goodson, TURN Attorney	2014	15.00	\$172.50	1/2 of requested hourly rate for 2013 (to be adjusted by 2014 COLA if any)	\$2,587.50	15.00	\$177.50	\$2,662.50
<b>Subtotal: \$2,587.50</b>						<b>Subtotal: \$2,662.50</b>		
<b>COSTS</b>								
<b>#</b>	<b>Item</b>	<b>Detail</b>			<b>Amount</b>	<b>Amount</b>		
	Copies	Copies of filings related to Phase II			\$25.30	\$23.50		
	Legal Research	Lexis-Nexus legal research fees			\$6.24	\$6.24		
	Postage	Mailing costs for filings related to Phase II			\$23.65	\$23.56		
	Travel	Costs Associated with Cynthia Mitchell's Travel to SF for the CEWG in-person meeting			\$116.30	\$116.30		
	Lodging	Costs Associated with Cynthia Mitchell's Lodging in SF for the CEWG in-person meeting			\$92.87	\$92.87		
	Telephone	Calls related to work in Phase II			\$41.64	\$41.64		
						<b>Subtotal: \$304.11</b>		
<b>TOTAL REQUEST: \$84,108.50</b>						<b>TOTAL AWARD: \$77,217.01</b>		

**\*\*We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.**

**\*\*Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate**

<b>ATTORNEY INFORMATION</b>			
<b>Attorney</b>	<b>Date Admitted to CA BAR<sup>7</sup></b>	<b>Member Number</b>	<b>Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation</b>
Hayley Goodson	December 2003	228535	No.

### **C. Intervenor's Comments on Part III:**

<b>Comment #</b>	<b>Intervenor's Comment(s)</b>
Comment 1	<p><b>Hourly Rates for TURN Attorney Hayley Goodson</b></p> <p><b><u>2013</u></b></p> <p>For Ms. Goodson's work in 2013, TURN seeks an hourly rate of \$345, an increase over the \$325 hourly rate adopted by the Commission in D.13-08-022 for her work in 2012. TURN has adjusted Ms. Goodson's 2012 hourly rate of \$325 by two factors in arriving at the requested 2013 rate. The first is the general 2% COLA authorized in Resolution ALJ-287 for 2013. The second is a 5% step increase, following Ms. Goodson's move to the 8-12-year experience tier in 2011. These two increases, rounded down, yield a \$345 hourly rate, well within the range of \$310-\$365 established in Resolution ALJ-287 for an attorney with Ms. Goodson's experience. This is the same 2013 hourly rate requested by TURN for Ms. Goodson in the requests for compensation currently pending in Application 11-10-002 (SDG&amp;E GRC Phase 2) and Rulemaking (R.) 10-02-005 (Disconnections OIR).</p> <p><b><u>2014</u></b></p>

<sup>7</sup> This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

	<p>For Ms. Goodson's work in 2014, TURN seeks the same hourly rate as for her work in 2013 because at the time of the submission of this request for compensation, the Commission has not adopted a general COLA for 2014. TURN requests that the Commission apply the COLA for 2014 (if any is adopted before the Commission issues a decision on this request) to Ms. Goodson's time in 2014. TURN additionally reserves the right to seek a higher rate for Ms. Goodson's work in 2014 in other proceedings, consistent with the Commission's guidelines.</p>
Comment 2	<p><b>Hourly Rates for Cynthia Mitchell, Energy Economics, Inc.</b></p> <p><b><u>2013-2014</u></b></p> <p>TURN requests an hourly rate of \$200 for Cynthia Mitchell's work in 2013 and 2014. This is the actual billing rate charged by Ms. Mitchell to TURN during this time. Ms. Mitchell increased her billing rate from \$180 to \$200 in 2013, the first increase since 2009. The Commission has previously adopted a billing rate of \$180 for Ms. Mitchell's time starting in 2009. <i>See e.g.</i>, D.11-06-012. The Commission has not yet adopted a 2013 billing rate for Ms. Mitchell.</p> <p>On Nov. 12, 2013, TURN submitted a Request for Intervenor Compensation in R.12-01-005, wherein TURN sought the Commission's approval of a \$200 billing rate for Ms. Mitchell in 2013. That request is currently pending. While TURN suspects that the Commission will process that Request before this one, TURN includes in this Request the same showing on Ms. Mitchell's 2013 billing rate that TURN included in our pending Request in R.12-01-005.</p> <p>Ms. Mitchell's prior 2011 billing rate of \$180 was based on her extensive experience as an expert in utility demand-side management activities. Ms. Mitchell has worked for over 35 years in the energy and utility industry. She has held positions in government and consulting. Ms. Mitchell was the energy specialist for Utah Community Action Association on utility rate issues for seniors and low income, and the chief economist for the Nevada Attorney General's Bureau of Consumer Protection. As a consultant, Ms. Mitchell has served as the expert witness to state public utility commissions and consumer advocate offices in twelve states and the District of Columbia. Ms. Mitchell's experience includes analysis on traditional utility rate making and regulatory matters with emphasis on cost allocation and rate design; integrated resource planning (IRP), and demand-side management activities. She has consulted for NASUCA and the DOE on integrated resource planning practices.</p> <p>It is reasonable to authorize a rate of \$200 for Ms. Mitchell services for 2013. Ms. Mitchell has not increased her billing rate of \$180 since 2009. If her rate were simply escalated based on the COLA adjustments for 2012 and 2013 authorized in Resolutions ALJ-281 and ALJ-287, her 2013 rate should be \$187 (<math>180 \times 1.022 \times 1.02</math>), which results in a rate of \$190 when rounded up. TURN also requests that the Commission authorize a 5% step increase for Ms. Mitchell, as allowed under both</p>

	<p>Resolution ALJ-281 and 287, which would then result in an hourly rate of \$199.50 (<math>190 \times 1.05</math>), or \$200 when rounded. TURN has not requested a 5% step increase previously for Ms. Mitchell. The same rate would result if TURN had requested a 5% step in 2012 (<math>180 \times 1.022 \times 1.05 \times 1.02 = 197</math>).</p> <p>Ms. Mitchell has consistently maintained her billing rate for non-profits such as TURN near the lowest endpoint of the range of rates for experts with over 13 years of experience. For example, Table 1 of Res. ALJ-281 shows that the lowest billing rate for an expert with 13+ years of experience is \$155, while the highest rates are at about \$390. Based on her experience of more than 30 years, Ms. Mitchell's billing rate should be closer to the upper end of the range; however, Ms. Mitchell has consistently maintained her rates at an affordable level. The Commission should, however, recognize that Ms. Mitchell's services justify a rate of \$200 based on the factors considered in setting expert hourly rates.</p> <p>For all of these reasons, TURN requests that the Commission authorize a billing rate of \$200 for Ms. Mitchell's time in 2013. Because Ms. Mitchell has not increased her rate in 2014, TURN requests that the Commission authorize this same rate for her time in 2014.</p>
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**D. CPUC Disallowances and Adjustments:**

Item	Reason
[1]	<p>The Commission does not compensate attorneys for work that is clerical in nature, as such work has been factored into the approved rate. The following hours, for finalizing documents, has been removed from Goodson's claim:</p> <p>0.5 hours on 11/29/2012; 0.25 hours (half of 0.5) on 12/14/2012; 0.625 hours (half of 1.25) on 3/14/2013; 1.19 hours (one-quarter of 4.75) on 3/11/2014; 0.5 hours on 3/17/2014; 1.00 hour (half of 2) on 5/30/2014; .125 hours (half of 0.25) on 6/6/2014; 0.25 hours (half of 0.5) on 7/17/2014</p>
[2]	<p>Duplication occurred when preparing work on the following issues: PH2-CE; PH2-ACR-CE; and PEV. The Commission has reduced the number of hours associated with these issues by 20%. As such the following hours have been disallowed: 1.75 for 2012; 7.02 for 2013; and 10.75 hours for 2014.</p>



**PART IV: OPPOSITIONS AND COMMENTS**

<b>A. Opposition: Did any party oppose the Claim?</b>	No.
<b>B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?</b>	Yes.

**FINDINGS OF FACT**

1. TURN has made a substantial contribution to D.12-12-011 and D.14-08-030.
2. The requested hourly rates for TURN's representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$77,217.01.

**CONCLUSION OF LAW**

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

**ORDER**

1. The Utility Reform Network shall be awarded \$77,217.01.
2. Within 30 days of the effective date of this decision Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric, and Southern California Gas Company shall pay The Utility Reform Network their respective shares of the award, based on their California-jurisdictional electric and gas revenues for the 2013 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning December 31, 2014, the 75<sup>th</sup> day after the filing of The Utility Reform Network's request, and continuing until full payment is made.

3. The comment period for today's decision is waived.

This order is effective today.

Dated \_\_\_\_\_, at San Francisco, California.

**APPENDIX**  
**Compensation Decision Summary Information**

<b>Compensation Decision:</b>		<b>Modifies Decision?</b>	
<b>Contribution Decision(s):</b>	D1212011, D1408030		
<b>Proceeding(s):</b>	A1105017, A1105018, A1105019, A1105020		
<b>Author:</b>	ALJ Kimberly Kim		
<b>Payer(s):</b>	Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric, and Southern California Gas Company		

**Intervenor Information**

<b>Intervenor</b>	<b>Claim Date</b>	<b>Amount Requested</b>	<b>Amount Awarded</b>	<b>Multiplier?</b>	<b>Reason Change/Disallowance</b>
The Utility Reform Network (TURN)	10/20/2014	\$84,108.50	\$77,217.01	N/A	See Disallowances & Adjustments, above.

**Advocate Information**

<b>First Name</b>	<b>Last Name</b>	<b>Type</b>	<b>Intervenor</b>	<b>Hourly Fee Requested</b>	<b>Year Hourly Fee Requested</b>	<b>Hourly Fee Adopted</b>
Hayley	Goodson	Attorney	TURN	\$325	2012	\$325
Hayley	Goodson	Attorney	TURN	\$345	2013	\$345
Hayley	Goodson	Attorney	TURN	\$345	2014	\$355
Cynthia	Mitchell	Expert	TURN	\$180	2012	\$185
Cynthia	Mitchell	Expert	TURN	\$200	2013	\$200
Cynthia	Mitchell	Expert	TURN	\$200	2014	\$205
Gillian	Court	Expert	TURN	\$150	2012	\$150

**(END OF APPENDIX)**